

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Essa-Aisha A. Purnell
Adbou R. Gueye

Case No.: 19-12644(MDC)

Debtor(s)

Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY AMERICAN HONDA FINANCE CORPORATION**

COMES NOW, Debtors, Essa-Aisha A. Purnell and Abou R. Gueye, hereinafter referred to as "Debtors," by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by American Honda Finance Corporation, "Movant", and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. By way of further response, it is specifically requested that the undersigned Counsel be provided with a complete post-petition payment history. Furthermore, the Debtors, on or about August 10, 2020, paid \$650.00 by automatic check to the Movant.
7. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: August 20, 2020

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor

Sadek & Cooper

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